

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NEEDHAM & COMPANY, LLC,	:	
	:	
<i>Plaintiff,</i>	:	Index No. 15 Civ. 2487 (NRB)
	:	
-against-	:	
	:	
ACCESS STAFFING, LLC, STEVE	:	<u>ORAL ARGUMENT REQUESTED</u>
WEBER, MICHAEL WEINSTEIN, JOSEPH	:	
TURANO, and GLEN ALBANESE,	:	
	:	
<i>Defendants.</i>	:	

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed: (a) declaration of Matthew G. DeOreo, dated October 23, 2015, and (b) the accompanying Memorandum of Law, dated October 23, 2015, Defendant Joseph Turano will move this Court, before the Honorable Naomi Reice Buchwald, U.S.D.J., in the United States Courthouse, Southern District of New York, 500 Pearl St., New York, N.Y. 10007, on such day when counsel may be heard, for an Order, pursuant to Fed. R. Civ. P. 12(b)(6), dismissing with prejudice the Complaint of Plaintiff Needham & Company, LLC, with such other and further relief as this Court deems just and proper.

Dated: New York, New York
October 23, 2015

Yours, etc.,

TACOPINA & SEIGEL

By:



Joseph Tacopina, Esq.
Matthew G. DeOreo, Esq.
275 Madison Ave., Fl. 35
New York, New York 10016
Tel: (212) 227-8877
Fax: (212) 619-1028
Attorneys for the Joseph Turano

To:

All Counsel
Via ECF

Glen Albanese, #64877-050
FCI Port Dix Satellite Camp
P.O. Box 2000
Joint Base MDL, NJ 08640
Via Regular Mail